

RE Reported discharges from Coeur d'Alene Tribal Casino near Worley.txt  
From: Ragsdale, Dave (ECY)  
Sent: Wednesday, January 30, 2008 2:44 PM  
To: park.chae@epa.gov; 'ogle.kimberly@epa.gov'  
Cc: Mike Hoyles; Stewart.Williamc@epamail.epa.gov;  
Lidgard.Michael@epamail.epa.gov; 'Wilson.Sharon@epamail.epa.gov';  
Woodruff.L Leigh@epamail.epa.gov  
Subject: RE: Reported discharges from Coeur d'Alene Tribal Casino near  
Worley

Chae. The contact Mike provided for the Coeur d'Alene casino is:

Jason Lundmark, Mechanical Maintenance Manager  
800.523.2426 ext. 7385  
P.O. Box 236  
Highway 95  
Worley, Idaho 83876-0236

My request is that Mr. Lundmark or a management level representative for this casino be contacted as soon as possible for two purposes:

The first reason being to get some information about the reported discharge(s) and determine why the Tribe is, or was discharging w/o a permit.

The second reason is to inform the casino operators that EPA cannot authorize additional discharges to the Hangman Creek watershed. The Creek is already impaired and a TMDL is currently under development. Scott Field (C d'Alene environmental coordinator) has been representing the tribe on the advisory workgroup for this TMDL and is very aware of the water quality situation. The casino needs to undertake whatever efforts are necessary to cease any ongoing or future discharges from their wastewater system.

I am willing to participate on this call if you desire or meet with their representative if requested. I have asked Mike Hoyles to include another inspection of wastewater facilities at the casino when he is next in the area. Thanks for your help.

David Ragsdale, Engineer  
EPA Region 10, Office of Water & Watersheds  
360.407.6589

-----Original Message-----

From: Wilson.Sharon@epamail.epa.gov [mailto:Wilson.Sharon@epamail.epa.gov]  
Sent: Tuesday, January 29, 2008 1:15 PM  
To: Ragsdale, Dave (ECY)  
Cc: park.chae@epa.gov; Croxton.David@epamail.epa.gov;  
Woodruff.L Leigh@epamail.epa.gov; Mike Hoyles; Stewart.Williamc@epamail.epa.gov;  
Lidgard.Michael@epamail.epa.gov  
Subject: RE: Reported discharges from Coeur d'Alene Tribal Casino near Worley

No, Craig did not have such authority and he has since left EPA. It's hard to say EPA approved it. I don't think there was anything written, but I learned about this from Mike. We are not approving any discharges to Rock Creek that I know of. To be honest, I thought it was a winter issue and that these overflows happen now, not in the summer. If we want to catch the discharge violation, someone should be inspecting now.

Here is the trip report from Mike that I just found in my e-files: (See attached file: Coeur d'Alene Casino\_102407.doc)

Sharon Wilson  
NPDES Permits Unit  
EPA Region 10  
206-553-0325

RE Reported discharges from Coeur d'Alene Tribal Casino near Worley.txt

"Ragsdale, Dave  
(ECY)"  
<RAGS461@ECY.WA.  
GOV>

01/29/2008 12:09  
PM

To  
Sharon Wilson/R10/USEPA/US@EPA,  
David Croxton/R10/USEPA/US@EPA

CC  
Chae Park/R10/USEPA/US@EPA, Leigh  
Woodruff/R10/USEPA/US@EPA,  
WilliamC  
Stewart/R10/USEPA/US@EPA,  
<paulson.craig@epa.gov>, Mike  
Hoyles/R10/USEPA/US@EPA

Subject  
RE: Reported discharges from  
Coeur d'Alene Tribal Casino near  
Worley

Thanks Sharon.

Does Craig Paulson have the authority to approve such discharges? If EPA provided this approval in writing could a copy of the transmittal be sent to me, please? I don't know what legally constitutes an "emergency", but Mike Hoyles says the casino has simply outgrown the capacity of their wastewater treatment system. If that is the actual situation, this is not an emergency but a failure to plan for the growth in business that the tribe encouraged to occur. My opinion is that EPA should not (cannot) be approving additional discharges to Rock Creek which will contribute to existing water quality problems. While there is still time for the tribe to plan and implement an alternative, we should tell them EPA cannot authorize more discharges to Rock Creek next summer.

You can imagine the situation created by EPA approving new discharges to already impaired waters at the same time the existing dischargers are being told they must treat to very low P concentrations (or not discharge during the critical season). Since Chae says he knew nothing about this it would appear the problem was somehow not communicated to our NPDES compliance group.

At this point I need guidance about what to communicate with Ecology, IDEQ and the TMDL advisory workgroup about this EPA regulated discharge. They are already aware there are problems with the casino's treatment system.

Thanks again for your help, Dave.

-----Original Message-----

From: Wilson.Sharon@epamail.epa.gov  
[mailto:Wilson.Sharon@epamail.epa.gov]  
Sent: Tuesday, January 29, 2008 11:10 AM  
To: Ragsdale, Dave (ECY)  
Cc: park.chae@epa.gov; Joy, Joe (ECY); Woodruff.Leigh@epamail.epa.gov;  
Stewart.Williamc@epamail.epa.gov

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Subject: Re: Reported discharges from Coeur d'Alene Tribal Casino near Worley

Dave, Mike knows this situation the best. We don't have a permit for them and haven't gotten an application. They got an "emergency approval" from Craig Paulson (!) last year, when their lagoon was about to overflow. A couple months ago, they were asking for approval again this year. We couldn't issue a permit that fast and didn't want to because they were talking about upgrading the plant. We referred it to compliance if I remember correctly.

Sharon Wilson  
NPDES Permits Unit  
EPA Region 10  
206-553-0325

"Ragsdale, Dave  
(ECY)"  
<RAGS461@ECY.WA.  
GOV>

01/29/2008 08:19  
AM

Sharon Wilson/R10/USEPA/US@EPA  
TO  
CC

"Joy, Joe (ECY)"  
<jjoy461@ECY.WA.GOV>, WilliamC  
Stewart/R10/USEPA/US@EPA, Leigh  
Woodruff/R10/USEPA/US@EPA, Chae  
Park/R10/USEPA/US@EPA  
Subject  
Reported discharges from Coeur  
d'Alene Tribal Casino near Worley

Sharon. Thanks for calling back yesterday. Sorry I missed your call.  
The reason I hope to talk with you is described briefly below:

I'm working with Ecology to develop a TMDL for Hangman Creek which is severely impaired by nutrients and other pollutants. The north fork of Rock Creek flows adjacent to this tribal casino and is a tributary to Hangman. Mike Hoyles relayed that the casino discharged wastewater from their lagoons into Rock Creek last summer because they have exceeded treatment system capacity. Supposedly, the casino routinely land applies water from the lagoons and I'm curious why they discharged directly into Rock Creek? I was also unaware the tribe had a permit to discharge into Rock Creek. Chae suggested that I call asked you about this situation because he didn't know anything about it.

Mike was told by the tribe that they had received "emergency approval" to discharge into Rock Creek and may be expecting to discharge again this summer. Such discharge is likely to contribute to further degradation of water quality in this watershed.

I'll try calling you later this morning about this. Thanks, Dave.

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